PILLSBURY WINTHROP SHAW PITTMAN LLP
MICHAEL CHIBIB, P.C. (admitted *pro hac vice*)
michael.chibib@pillsburylaw.com
401 Congress Ave., Suite 1700
Austin, TX 78701-3797
Telephone: 512.580.9609
Facsimile: 512.580.9601

PILLSBURY WINTHROP SHAW PITTMAN LLP
JEFFREY D. WEXLER (SBN 132256)
jeffrey.wexler@pillsburylaw.com
TIMOTHY RAWSON (SBN 304755)
tim.rawson@pillsburylaw.com
725 South Figueroa Street, Suite 2800
Los Angeles, CA 90017-5406
Telephone: 213.488.7100
Facsimile: 213.629.1033

Attorneys for Plaintiff and Counterdefendant UM CORPORATION and Counterdefendant GOLDEN MEDIA GROUP, INC. and TIGA ENTERTAINMENT COMPANY, LTD.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

UM CORPORATION, a Japanese corporation,

Plaintiff,

v.

TSUBURAYA PRODUCTIONS CO., LTD., a Japanese corporation,

Defendant.

AND RELATED CROSS-CLAIMS

Case No. 2:15-cv-03764-AB (AJWx)

DECLARATION OF JESADA ANUCHAREE IN SUPPORT OF MOTION *IN LIMINE* NO. 2 OF PLAINTIFF AND COUNTERDEFENDANT UM CORPORATION AND COUNTERDEFENDANTS GOLDEN MEDIA GROUP, INC. AND TIGA ENTERTAINMENT COMPANY, LTD. FOR ORDER ALLOWING USE OF FORMER TRIAL TESTIMONY OF SOMPOTE SAENGDUENCHAI PURSUANT TO FED. R. EVID. 804(b)(1)

Hearing Date: October 20, 2017
Hearing Time: 11:00 a.m.
Courtroom: 7B

Pretrial Conf.: October 20, 2017
Trial: November 7, 2017

DECLARATION OF JESADA ANUCHAREE

I, Jesada Anucharee, declare:

1. I am an attorney licensed to practice law in the Kingdom of Thailand. I am an attorney for UM Corporation ("UMC") in Thailand. In addition, I used to be a legal counsel for Sompote Saengduenchai ("Sompote"). Unless indicated otherwise, I have personal knowledge of the following facts, and if called as a witness I could and would testify competently to those facts.

2. I submit this declaration to provide information concerning my attempt, as an authorized attorney of UMC, to contact and ask Sompote to be a witness at the trial of the above-caption lawsuit (the "United States Lawsuit") which is scheduled to commence on November 7, 2017, and Sompote's refusal to agree to appear at the trial.

3. On about August 14, 2017, UMC asked me to contact Sompote to determine whether he would be willing to appear as a witness at the trial of the United States Lawsuit. Due to my previous position as a legal counsel of Sompote, coupled with my understanding as to the conflict in the relationship between UMC and Sompote and UMC's resulting inability to contact Sompote directly, I undertook the task and contacted Sompote afterwards.

4. I contacted Sompote by phone in Thailand. After I informed Sompote that UMC wanted to know whether he would be willing to appear as a witness at trial in the United States Lawsuit, he sent a notice rejecting the request. He told me that he does not want to be a witness in the lawsuit. He told me that that he is already very old and that the condition of his health prevents long-distance traveling. He also said that he no longer holds any of the rights being disputed in the United States Lawsuit, and that there is no reason for him to take a high risk with his health by making a long-distance trip to be a witness in a lawsuit that has nothing to do with him. Sompote

did not provide details on the condition of his health.

I declare under the penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed this 20 day of September, 2017, at Bangkok, the Kingdom of Thailand.

Jesada Anucharee